

FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

2017 MAR -9 PM 3:33

MGRD, INC.,

Plaintiff,

vs.

WAIORA, LLC AND WAIORA  
INTERNATIONAL, LTD.,

Defendants.

CLERK U.S. DISTRICT COURT  
Case No. NORTHERN DISTRICT OF OHIO  
CLEVELAND

1 : 17 MC 00014

JUDGE NUGENT

MOTION TO QUASH SUBPOENA ISSUED TO TODD BENNI, ESQ.

Waioira, LLC and Waioira International, Ltd. (collectively, "Waioira") and third-party Todd Benni, Esq. move the Court to enter an order under Federal Rules of Civil Procedure 26 and 45 quashing the subpoena propounded by MGRD, Inc. on March 3, 2017 (the "Subpoena") to take Mr. Benni's deposition on March 14, 2017, in Southern District of Florida case number 17-CV-60061-Bloom, captioned *MGRD, Inc. v. Waioira, LLC and Waioira International, Ltd.* As set forth in more detail the memorandum in support being filed herewith, the Court should quash the Subpoena because, as one of Waioira's attorneys, any testimony Mr. Benni could provide is protected by the attorney-client privilege and work-product immunity and is otherwise not relevant or discoverable.

Dated: March 9, 2017

Respectfully submitted,



David T. Movius (0070132)

[dmovius@mcdonaldhopkins.com](mailto:dmovius@mcdonaldhopkins.com)

Mark Masterson (0086395)

[dmovius@mcdonaldhopkins.com](mailto:dmovius@mcdonaldhopkins.com)

MCDONALD HOPKINS LLC

600 Superior Avenue, East, Ste. 2100

Cleveland, Ohio 44114

t 216.348.5400 | f 216.348.5474

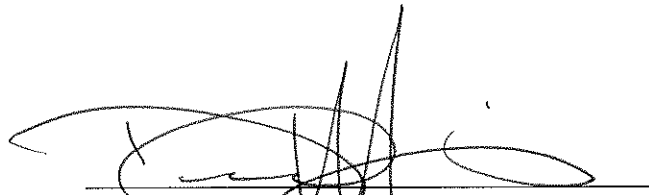
*Attorney for Waiora, LLC, Waiora  
International, Ltd. and Todd Benni, Esq.*

Certificate of Service

I hereby certify that, on March 9, 2017, a copy of the foregoing is being served upon Daniel DeSouza, Esq., MGRD's counsel of record in the Florida matter, via email and by hand delivery at the following addresses:

Daniel DeSouza, Esq.  
101 NE Third Avenue  
Suite 1500  
Fort Lauderdale, FL 33301

*DDesouza@desouzalaw.com*



*Attorney for Waiora, LLC and Waiora  
International, Ltd. and Todd Benni, Esq.*